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July 28, 2017

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84

Dear Ms. Dortch:

On July 27, 2017, John Burchett of Google Fiber Inc. and Julie Veach and the undersigned, both of Harris, Wiltshire & Grannis LLP, met with Jay Schwarz, Jay Kaplan, and Kenzie Nothnagel of Chairman Pai's office, to discuss Google Fiber's comments and reply comments in the above-captioned proceeding. Our discussion was substantively identical to the discussions Google Fiber had with the Chairman's staff, Commissioners' staff, and Wireline Competition Bureau staff on June 29, 2017. Our ex parte notice for those meetings is attached.

Google Fiber appreciates the opportunity to discuss its position. Please do not hesitate to contact me with any questions.

Sincerely,

Kristine Laudadio Devine
Counsel to Google Fiber Inc.

Attachment
Cc: Jay Schwarz
Jay Kaplan
Kenzie Nothnagel

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ATTORNEYS AT LAW

July 3, 2017

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84

Dear Ms. Dortch:

On June 29, 2017, John Burchett of Google Fiber, Inc. and Julie Veach and the undersigned, both of Harris, Wiltshire & Grannis LLP, met separately with Kristine Fargotstein of the Chairman's office, Claude Aiken of Commissioner Clyburn's office, and Amy Bender of Commissioner O'Rielly's office. On that day the same individuals also met with Madeleine Findley, Daniel Kahn, Adam Copeland, Michael Ray, Brian Hurley, Zach Ross, John Visclosky, Timothy Graham, and Janki Kaneria of the Wireline Competition Bureau to discuss Google Fiber's comments in the above-referenced proceeding.

Google Fiber discussed the specifics of one-touch make-ready ("OTMR") as proposed in its comments and how its formulation would help increase broadband deployment around the country. OTMR would facilitate deployment of broadband networks by addressing nearly all of the concerns about the current make-ready process raised by the Commission in the NPRM. Google Fiber proposes OTMR that would allow a new attacher with permission to install attachments on a pole to use a contractor approved by the pole owner to perform all work on existing attachments needed to make the pole ready for its new attachments.

Google Fiber noted the broad support in the record for OTMR—from investor-owned utilities to Verizon. The chief opponents of OTMR in the record are cable companies, which seem primarily concerned about the implications of a third party performing work on their facilities. Google Fiber pointed out that, because that third party would be approved by the pole owner and not by the new attacher, those concerns should be alleviated. Google Fiber also noted that, in many markets, the contractors approved by pole owners are the same contractors used by attachers, both incumbents and new providers. Google Fiber also clarified for Bureau staff that another concern expressed by opponents of OTMR—specifically, who determines whether make-ready is simple or complex—is addressed by its proposal because that determination would be made by the approved contractor, not by the new attacher.

Google Fiber pointed out that alternative procedures proposed by other commenters will not succeed in reducing delay and speeding deployment of new networks because those procedures do not address the fundamental problem with make-ready construction as it currently exists—the sequential nature of the work. Google Fiber noted, as depicted on the attached

graphic, that where each attacher must perform its own make-ready work, delays are inevitable. This would be the case even where make-ready deadlines were reduced, because of the coordination needed among multiple parties to determine what work must be done, by whom, and in what order. In addition, sequential make-ready is economically inefficient because each attacher's contractor must make a trip to the pole, rather than allowing one contractor to make all adjustments to existing attachments in one visit. It also presents greater risks of damage to poles and attachments, as well as increased disruption of the public rights-of-way from multiple visits to each pole. Where a single contractor can perform all make-ready on a pole at once, all stakeholders benefit.

Google Fiber appreciates the opportunity to discuss its proposal. Please do not hesitate to contact me with any questions.

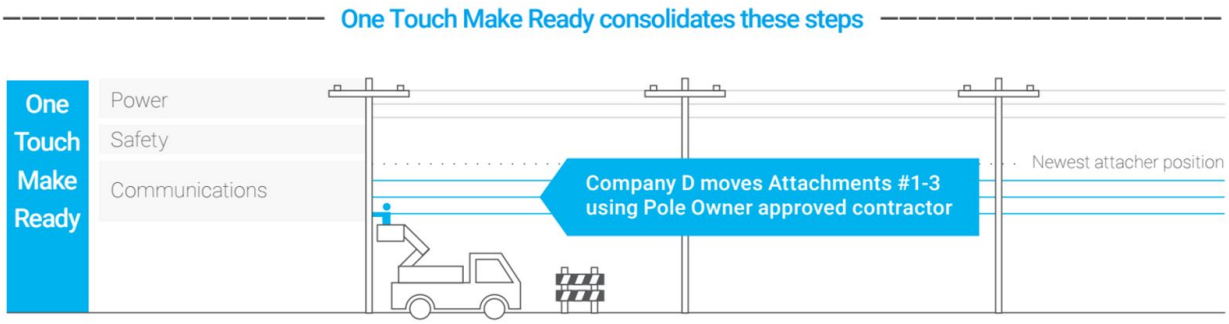
Sincerely,

Kristine Laudadio Devine
Counsel to Google Fiber, Inc.

Attachment
Cc: Claude Aiken
Amy Bender
Adam Copeland
Kristine Fargotstein
Madeleine Findley
Timothy Graham
Brian Hurley
Daniel Kahn
Janki Kaneria
Michael Ray
Zach Ross
John Visclosky

Traditional Make Ready Process

A Better Way: One-Touch Make Ready



- Allows any provider attaching to a pole to perform all make-ready work, as long as it uses engineering designs and contractors approved by the pole owner
    - Exception for work that may put customers out of service
- Reduces the disruption, inconvenience and delay that come from work by multiple crews
- Improves safety and pole integrity